

California Farm Bureau Federation

GOVERNMENTAL AFFAIRS DIVISION

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Winston Hickox, Chairman Market Advisory Committee California Air Resources Board 1001 I Street, 15th Floor Sacramento, CA 95814

Dear Mr. Hickox,

We appreciate all the hard work that you and your committee have undergone to produce the "Recommendations for Designing a Greenhouse Gas Cap-and Trade System for California" report in such a short period of time. Representing the agricultural community as the agricultural representative on the AB 32 Economic Technology Advancement Advisory Committee, there is a full appreciation of the responsibility this task placed on you and your committee members.

We support your findings on page 25-26 and 75 that biological processes should not be required to be included in a cap and trade program. We also support your statement that landfill and digester gas are good offset provisions. We want to make you aware that there is extensive research underway in the California university systems, nationally (including the United States Department of Agriculture) and internationally at research centers throughout the world on soil carbon sequestration and many other GHG mitigation methods. There is clearly potential to provide greenhouse gas reductions through agricultural and forestry operations that must not be negated. While the MAC report notes the difficulties of monitoring biological systems, it is important that the report reflect that research is underway and biological processes have potential to provide offsets with further research.

The forestry and agricultural communities understand we have challenges to face to find a user-friendly manner to provide offsets that meet the parameters required for GHG mitigation. But it is also clear that there is not going to be one answer to reach the goals of the Global Warming Solutions Act of 2006. Dealing with climate change is going to require a dynamic set of solutions that demand we use every technological solution we have and those we have not yet realized. We ask that the report reflect a concept of openness as opposed to writing off solutions before they have had a chance to be fully developed.

The agriculture and forestry section of the ETAAC report will contains many ideas for new technological solutions that could provide GHG offsets. We ask that you also embrace these possibilities in your report. Please contact us if you need further information about the extensive agricultural and forestry GHG reduction research underway.

Sincerely,

Cynthia L. Cory

Director, Environmental Affairs

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